

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re:	§	Chapter 11
	§	
J.C. PENNEY COMPANY, INC., <i>et al.</i> ,	§	Case No. 20-20182 (DRJ)
	§	
Debtors.	§	(Jointly Administered)

**SANDEEP DIAMOND CORPORATION’S JOINDER IN
RESERVATION OF RIGHTS AND RESPONSE OF RICHLINE GROUP, INC.,
ALLURE GEMS, LLC, B.H. MULTI COM CORP., B.H. MULTI COLOR CORP.,
RENAISSANCE JEWELRY NEW YORK, INC., JAY GEMS, INC., GOLDIAM USA,
INC., AND SHR JEWELRY GROUP, LLC, TO DEBTORS’ EMERGENCY
MOTION FOR ENTRY OF (I) AN INTERIM AND FINAL ORDER (A)
AUTHORIZING DEBTORS TO USE CASH COLLATERAL, (B) GRANTING
ADEQUATE PROTECTION TO THE PREPETITION SECURED PARTIES, AND
(C) SCHEDULING A FINAL HEARING; AND (II) A FINAL ORDER (A)
AUTHORIZING THE DEBTORS TO OBTAIN POSTPETITION FINANCING
PURSUANT TO SECTION 364 OF THE BANKRUPTCY CODE, (B) GRANTING
LIENS AND SUPERPRIORITY CLAIMS, (C) MODIFYING
THE AUTOMATIC STAY, AND (III) GRANTING RELATED RELIEF
[RELATES TO DKT. NOS. 38, 504]**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Sandeep Diamond Corporation (“**Sandeep**”) hereby joins in *Reservation of Rights and Response of Richline Group, Inc., Allure Gems, LLC, B.H. Multi Com Corp., B.H. Multi Color Corp., Renaissance Jewelry New York, Inc. Jay Gems, Inc., Goldiam USA, Inc., and SHR Jewelry Group, LLC, to Debtors’ Emergency Motion for Entry of (I) An Interim and Final Order (A) Authorizing Debtors to Use Cash Collateral, (B) Granting Adequate Protection to the Prepetition Secured Parties, and (C) Scheduling a Final Hearing; and (II) A Final Order (A) Authorizing the Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (B) Granting Liens and Superpriority Claims, (C) Modifying the Automatic Stay, and (III) Granting Related Relief* [Dkt. No. 504] (the “**Consignment Vendors’ Response**”).

For the reasons stated in the Consignment Vendors' Response, Sandeep respectfully requests that the Court enter an Order denying the *Debtors' Emergency Motion for Entry of (I) An Interim and Final Order (A) Authorizing Debtors to use Cash Collateral, (B) Granting Adequate Protection to the Prepetition Secured Parties, and (C) Scheduling a Final Hearing; and (II) A Final Order (A) Authorizing the Debtors to Obtain Postpetition Financing Pursuant to Section 364 of the Bankruptcy Code, (B) Granting Liens and Superpriority Claims, (C) Modifying the Automatic Stay, and (III) Granting Related Relief* [Docket No. 38] or modifying the Final Order as proposed in the Consignment Vendors' Response, and granting such other relief as may be just and proper under the circumstances.

DATED: June 3, 2020

Respectfully submitted,

POLSINELLI PC

By: /s/ Savanna Barlow

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**ATTORNEYS FOR SANDEEP
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CERTIFICATE OF SERVICE

I certify that on June 3, 2020, I electronically filed the foregoing document with the Clerk of the Court for the Southern District of Texas, Corpus Christi Division, using the CM/ECF system. The ECF system will send a “Notice of Electronic Filing” to all counsel of record who have consented in writing to accept service of this document by electronic means.

/s/ Savanna Barlow

Savanna Barlow